



ENTERED  
11/05/2019

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<hr/> <p>In re:</p> <p>ALTA MESA RESOURCES, INC., <i>et al.</i>,</p> <p style="text-align: center;">Debtors.<sup>1</sup></p> <hr/>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No. 19-35133 (MI)</p> <p>(Jointly Administered)</p>
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**STIPULATION AND AGREED ORDER REGARDING MOTIONS TO LIFT  
THE AUTOMATIC STAY TO THE EXTENT INSURANCE PROCEEDS EXIST**

The above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) and the Lift Stay Creditors<sup>2</sup> hereby stipulate and agree as follows:

WHEREAS, on September 11, 2019, the Debtors filed petitions for relief under chapter 11 of title 11 of the United States Code in the Bankruptcy Court for the Southern District of Texas (the “Court”);

WHEREAS, on October 24, 2019, the Lift Stay Creditors each filed a *Motion to Lift the Automatic Stay to the Extent Insurance Proceeds Exist* [See Docket Nos. 381–401, 406-408] (collectively, the “Lift Stay Motions”) pursuant to section 362(d) of Title 11 of the United States Code (the “Bankruptcy Code”);

WHEREAS, section 362(e) of the Bankruptcy Code provides that “[t]hirty days after a request under subsection (d) of this section for relief from the stay . . . such stay is terminated with

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers are as follows: Alta Mesa Resources, Inc. (3840); Alta Mesa Holdings, LP (5150); Alta Mesa Holdings GP, LLC (0642); OEM GP, LLC (0958); Alta Mesa Finance Services Corp. (5673); Alta Mesa Services, LP (7295); and Oklahoma Energy Acquisitions, LP (3762). The location of the Debtors’ corporate headquarters and service address is 15021 Katy Freeway, 4th Floor, Houston, Texas 77094.

<sup>2</sup> The Lift Stay Creditors are: Big Creek Energy, LLC; Cimarron Production Co., Inc.; Brown & Borelli, Inc., E. Edd Pritchett, Sr.; Almont Energy, LLC; Gai-Jin Trading Co., LLC; Lawrence James, LLC; M&V Resources, Inc.; Raw Crude Oil & Gas, LLC; Donna D. Webb; Plainsmen Energy, LLC; Jerry Sanner Oil Properties, Inc.; LCB Resources, Inc.; and George H. Russel Oil & Gas Investments, Inc.

respect to the party in interest making such request, unless the court, after notice and a hearing, orders such stay continued in effect pending the conclusion of, or as a result of, a final hearing and determination under subsection (d) of this section” (the “362 Hearing”); [1]

WHEREAS, a stipulated continuance of the 362 Hearing and waiver of the 30-day hearing requirement is allowed under Rule 4001-1(a)(7) of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas; and

WHEREAS, the Parties agree to extend the 362 Hearing to a final hearing, which shall be held on December 10, 2019.

**Accordingly, the Parties hereby Stipulate and Agree that:**

1. The 362 Hearings shall be continued until December 10, 2019, and the Debtors’ deadline to respond to the Lift Stay Motions is extended until December 3, 2019.

2. A final hearing regarding the Lift Stay Motions shall be held on December 10, 2019, or such later date as may be ordered by the Court.

3. The automatic stay imposed under section 362(a) of the Bankruptcy Code shall remain in effect through December 10, 2019, or such later date as may be ordered by the Court.

4. The undersigned represent that they are authorized to execute this Stipulation on behalf of the representative parties for whom they have signed.

5. This Stipulation shall be binding upon the Parties’ successors, agents, assigns, including bankruptcy trustees and estate representatives, and any parent, subsidiary, or affiliated entity of the Parties.

6. The Parties agree that the Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation, and the Parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation.

[1] The Court makes no finding that § 362(e) <sup>2</sup>applies to these motions for relief from the stay.

**STIPULATED AND AGREED TO BY:**

**COUNSEL FOR THE DEBTORS AND  
DEBTORS IN POSSESSION**

/s/ John F. Higgins

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IT IS SO ORDERED.

Signed: November 05, 2019

A handwritten signature in black ink, appearing to read 'Marvin Isgur', is written over a horizontal line.

Marvin Isgur  
United States Bankruptcy Judge